

Michael A. Burke, Esq. (NSB #11527)
 ROBISON, SHARP, SULLIVAN & BRUST
 71 Washington St.
 Reno, NV 89503
 Telephone: (775) 329-3151
 Email: mburke@rssblaw.com

Andrea Pacelli, Esq. (*pro hac vice*)
 Elizabeth Long, Esq. (*pro hac vice*)
 Eric Berger, Esq. (*pro hac vice*)
 KING & WOOD MALLESONS LLP
 500 Fifth Ave., 50th Floor
 New York, New York 10110
 Telephone: (212) 319-4755
 Email: andrea.pacelli@us.kwm.com
elizabeth.long@us.kwm.com
eric.berger@us.kwm.com

Steven C. Sereboff, Esq. (*pro hac vice*)
 SoCAL IP LAW GROUP LLP
 1332 Anacapa, Suite 201
 Santa Barbara, CA 93101
 Telephone: (805) 230-1356
 Email: ssereboff@socalip.com

*Attorneys for Plaintiff Applications in Internet
 Time, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Applications in Internet Time, LLC,
 Plaintiff,
 v.
 Salesforce.com, Inc.
 Defendant.

Case No. 3:13-CV-00628-RCJ-CLB

**AIT’S REQUEST FOR A STATUS
 CONFERENCE UNDER L.R. 16-2**

Pursuant to L.R. 16-2, Plaintiff Applications in Internet Time, LLC (“AIT”) respectfully requests that the Court hold a status conference in view of the termination of *inter partes* review (“IPR”) proceedings involving the two patents at issue in this action.

This action has been stayed since June 14, 2016 pending IPR proceedings filed by RPX

1 Corporation (“RPX”) challenging the validity of the two patents at issue. (Dkt. #82.) However, the
 2 Court’s purpose for the stay disappeared when the Patent Trial and Appeal Board (“PTAB”)
 3 terminated the IPR proceedings (Dkt. #127, Ex. B), and further denied RPX’s request for rehearing
 4 of the termination decision (Dkt. #137, Ex. A). Notably, Salesforce’s only argument for maintaining
 5 or extending the stay was based on the theoretical possibility the PTAB could grant rehearing, a
 6 possibility that no longer exists. (*See* Dkt. #134.) Despite this, Salesforce has refused to engage in
 7 discovery or discussions concerning resumption of the action. As such, AIT respectfully requests a
 8 status conference for the parties to discuss with the Court the time and manner in which activity in
 9 this case should be restarted, including, e.g., the scheduling of a *Markman* hearing and the setting
 10 of a calendar for the completion of fact and expert discovery.

11 DATED: This 7th day of January 2021.

12 ROBISON, SHARP, SULLIVAN & BRUST
 13 71 Washington Street
 Reno, Nevada 89503

14 /s/ Michael A. Burke, Esq.
 15 MICHAEL A. BURKE, ESQ.
Attorneys for Plaintiff Applications in Internet Time, LLC

16 Andrea Pacelli, Esq. (pro hac vice)
 17 Elizabeth Long, Esq. (pro hac vice)
 18 Eric Berger, Esq. (pro hac vice)
 KING & WOOD MALLESONS LLP
 19 500 Fifth Ave., 50th Floor
 New York, New York 10110

20 Steven C. Sereboff (pro hac vice)
 21 SoCAL IP LAW GROUP LLP
 1332 Anacapa, Suite 201
 22 Santa Barbara, CA 93101

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the attached **AIT'S REQUEST FOR A STATUS CONFERENCE UNDER L.R. 16-2** on all parties to this action by the method(s) indicated below:

_____ by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

John J Frankovich
Leigh T Goddard
McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor
P.O. Box 2670
Reno, NV 89505-2670

Kevin P.B. Johnson
Ray R Zado
Sam S. Stake
Quinn Emanuel Urquhart & Sullivan, LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065

Sam S. Stake
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

Attorneys for Defendant Salesforce.com, Inc.

_____ by personal delivery/hand delivery addressed to:

_____ by email addressed to:

John J. Frankovich:	jfrankovich@mcdonaldcarano.com
Leigh T. Goddard:	lgoddard@mcdonaldcarano.com
Kevin P.B. Johnson:	kevinjohnson@quinnemanuel.com
Ray R. Zado:	rayzado@quinnemanuel.com
Sam Stake:	samstake@quinnemanuel.com

 X by using the Court's CM/ECF Electronic Notification System.

DATED this 7th day of January, 2021.

/s/ Monica R. Wilmoth
Employee of Robison, Sharp, Sullivan & Brust